

Please scroll down for the English version

InControl 隱私權政策

上次更新：2023 年 11 月 30 日

政策聲明

Jaguar Land Rover 是世界首屈一指的高級汽車生產商之一。創新與設計可提供我們的客戶所熱愛之生活體驗——預測並超乎客戶的需求與期望。品質與卓越是我們的標誌。照顧我們的客戶為第一要務。

我們尊重所有處理的個人資訊之隱私。本「隱私權政策」說明我們如何運用從您使用「My InControl 服務」、我們的車輛（本「隱私權政策」中稱為「車輛」）、產品及服務中所接收的個人資料。Jaguar Land Rover 致力於保護我們所處理之個人資料的隱私權、保密性與安全性。我們遵守適用之資料隱私權法律的規定，並且確保所有員工與代理人皆會如同本「隱私權政策」所說明之方式，維護相關義務。

資料保護資訊

1. 資料控制者資訊：我們是誰？如何與我們聯絡？

我們是誰？：當我們在本「隱私權政策」中提及「Jaguar Land Rover」、「JLR」、「我們」、「我們的」或「我方」時，即指資料控制者：Jaguar Land Rover Limited，登記辦公室地址為：Abbey Road, Whitley, Coventry CV3 4LF, England，且英格蘭公司編號為：1672070。

若您想瞭解更多關於 Jaguar Land Rover 集團的資訊，請參閱下方的「告訴我更多」說明框。

客戶關係中心聯絡方式：若對本「隱私權政策」或其中包含的產品及服務有任何疑問，您可傳送電子郵件至以下地址與我們聯絡：apcr@jaguarlandrover.com

告訴我更多...

...關於 JAGUAR LAND ROVER 集團...

Jaguar Land Rover 為其母公司 Jaguar Land Rover Automotive plc 事業群的一部分。您可以在我們的網站上查詢更多有關 Jaguar Land Rover 的企業資訊：<https://www.jaguarlandrover.com/>。

Jaguar Land Rover 屬於塔塔集團 (Tata group) 的一部分。關於塔塔集團及塔塔事業群的更多詳情，請參閱：http://www.tata.com/aboutus/sub_index/Leadership-with-trust 及 <http://www.tata.com/company/index/Tata-companies>

2. 本隱私權政策適用於哪些內容

- 本「隱私權政策」適用於您對以下項目的使用：

- 「**InControl Remote 應用程式**」為您自「線上商店」下載至您的智慧型手機或手持裝置（統稱為「**裝置**」）的智慧型手機應用程式（「**應用程式**」），讓您可使用「**Remote Essentials**」功能，並且根據您的訂閱而定，可能亦可使用「**Remote/Remote Premium**」功能；
- 「**My InControl 網站**」，您可從該處存取「**InControl 服務**」帳戶與存取特定「**InControl 服務**」；
- 任何下列「**InControl**」服務（根據您車輛的車款與訂閱而定）：(i) 透過「**InControl Remote 應用程式**」與「**My InControl 網站**」提供的服務；(ii) 「**SOS 緊急通報**」服務；(iii) 「**優化道路救援**」服務；(iv) 「**InControl Secure Tracker/Secure Tracker Pro**」服務；以及 (v) 任何連結的應用程式及服務或 **InControl** 可用的應用程式及服務（「**InControl 服務**」）；
- 資訊娛樂系統，包括 **InControl Touch Pro** 及 **Pivi Pro** 「功能」；（本「**隱私權政策**」中「**功能**」一詞的使用，適用於配備 **InControl TouchPro** 或 **Pivi Pro** 的車輛，且包含資訊娛樂、連線服務、軟體更新功能以及「**Live**」服務（包括構成該等功能或與該等功能相關的所有軟體、影像、文字、資料與其他內容）；以及
- 其他連線之車輛系統及服務。

請注意，本「**隱私權政策**」不適用於您在使用「**InControl 服務**」時可能存取的第三方網站，或您為了直接接受該服務或應用程式而向第三方註冊的服務或應用程式，若為此情況，請參見相關第三方的**隱私權政策**。

本「**隱私權政策**」規定了在您使用「**My InControl 網站**」或我們於第二節所述之車輛、產品及服務後，我們會從您收集哪些個人資料，或您會向我們提供哪些個人資料，並由我們進行處理。請詳細閱讀，以瞭解我們對您的個人資料之做法，以及我們的處理方式。

請注意，您有責任警示所有乘客與您授權使用您的車輛、資訊娛樂系統和／或「**InControl 服務**」的人員，告知本「**隱私權政策**」內所述的**隱私權做法**（包括我們可能從車輛收集與使用資料的方式，以及／或收集與使用關於車輛之「**使用者**」資料的方式）。

3. 我們收集的資訊類型

我們可能會收集與處理關於您與／或您車輛的下列資料：

- **送出資訊**：您在設定「**InControl 服務**」帳戶期間填寫於線上表格之資訊，或您於使用「**My InControl 網站**」及「**InControl 服務**」期間，透過使用您的車輛資訊娛樂系統及其「**功能**」而可能直接提供我們的資訊（例如：當您透過電話或電子郵件或透過「**My InControl 網站**」表格向我們溝通時），或授權代理商（您自其買或租賃車輛）代您設定「**InControl 服務**」帳戶時提供之資訊，或與您有關之任何其他通訊或後續與之相關的任何其他通訊。此類資訊依您行為的性質而定，但可能包括您的姓名、地址、電話號碼（包括智慧型手機號碼）、電子郵件地址、語言偏好、您的「**InControl 服務**」帳戶的密碼與 PIN，您的車輛資訊娛樂選擇與偏好，以及您偏好的授權代理商之相關資訊。
- **其他資訊**：
 - 如果您與我們聯絡，我們可能會保留該通訊記錄；以及
 - 您透過「**My InControl 網站**」執行之交易的詳細資料。

- 裝置資訊（包括位置）：**我們可能會收集與「裝置」的相關資訊，或您用於存取我們的網站或下載「InControl Remote 應用程式」至智慧型手機「裝置」之任何電腦的相關資訊，包括作業系統、製造商、型號與版本、「InControl Remote 應用程式」安裝唯一識別碼、「裝置」的地區設定和國碼。「InControl Remote 應用程式」亦可能收集關於您裝置位置、Token 與使用者名稱的資訊，以供識別之用，但該等資訊不會傳送給我們。您為了下載「InControl Remote 應用程式」所提供的同意書，包含了同意使用 GPS 或應用程式服務之位置資訊，包括地圖資訊。您可以停用「裝置」的位置功能，或不使用需要位置資訊的「裝置」功能，以限制存取或收集「裝置」位置。請注意，這可能會對您可以使用的應用程式服務產生影響。我們的「應用程式」可能提供啟用「裝置」之指紋或視網膜掃描技術的選擇，以在「應用程式」中驗證您的身分，在該等情況下，我們不會收集您的指紋或視網膜掃描資訊，而是只會收到您「裝置」確認驗證檢查已成功的資訊。關於「裝置」資料、自動資料收集與 cookie 的更多資訊，請參閱以下的 Cookie 政策。
- 車輛識別資訊：**關於您註冊至「InControl 服務」之車輛的資訊，包括車輛識別號碼（VIN）、製造商、型號、車款年、功能、登記號碼、購買或租賃日期，以及您向其購買或租賃車輛的授權代理商。
- 位置資訊：**為了向您提供「InControl 服務」，我們與我們的服務供應商必須利用從您的車輛所傳送的位置資料，包括其最後停車位置的資訊。我們亦可能會隨時收集與處理關於車輛的其他資訊，此為「InControl 服務」之「旅程追蹤」功能（「旅程」）的一部分。在下方「旅程資訊」中說明了我們就此功能所收集與處理的資訊。在您接收「InControl 服務」期間，我們一律會追蹤車輛最後的停車位置（且您無法關閉該功能）。您可以透過「My InControl 網站」與「InControl Remote 應用程式」隨時關閉「旅程」。但如果啟動「SOS 緊急通報」、「優化救援」或「InControl Secure Tracker / Secure Tracker Pro」功能，則於發生相關觸發事件時，即使您已關閉「旅程」，仍會將關於「車輛」的即時位置資料傳送至相關的服務供應商與／或緊急服務（如適用）。例如：您的車輛在點火開關關閉時遭拖吊，以「InControl Secure Tracker / Secure Tracker Pro」方式移動或分別啟用車輛之安全氣囊時，皆屬前述觸發事件。如需相關觸發事件的完整詳細資料，請參閱車輛手冊。位置資訊亦為必要（與「旅程資訊」功能相互獨立），以使用特定「InControl 服務」與「功能」之功能，包括：在地圖上定位您的車輛並取得步行返車路線，以及於擁擠的停車場發出「嗶聲及閃光」的功能，以找出您車輛的位置。即使您尚未啟動「InControl 服務」帳戶，車輛仍會以有限緊急通報功能自動撥出電話以聯絡緊急服務，或您可以手動撥出語音電話至緊急服務。進行該等通話可能會傳輸資訊，包括向我們與／或我們的緊急服務供應商傳送車輛位置、時間與車輛識別碼，如同此處的車輛手冊所述：<https://www.ownerinfo.jaguar.com> 與 <https://www.ownerinfo.landrover.com>。
- 旅程資訊：**從您的車輛傳送的旅程相關資訊，包括旅程距離、即時位置、旅程期間、平均速度與旅程效率相關資料。如前所述，您可以透過「My InControl 網站」與「InControl Remote 應用程式」關閉「旅程」。如此可防止從車輛傳送任何上述資訊（最後停車位置除外）。如上所述，但若啟動「SOS 緊急通報」、「優化道路救援」或「InControl Secure Tracker / Secure Tracker Pro」功能，則即使您已關閉「旅程」功能，仍會將車輛的位置資料傳送至相關的服務供應商與／或緊急服務（若有適用）。
- 語音資料記錄資訊：**語音資料和「送出的資料」會分享給我們的語音服務供應商，以便讓您的語音指令獲得回應，其中可能包括以下資訊：音訊檔、相關轉錄檔及記錄檔案。
- 車輛操作資訊：**這包括與做為產品之車輛相關的技術資料，包括關於車輛元件的資料（例如序號、軟體版本）；車輛品質和維護（例如診斷故障代碼）；涉入意外之車輛的相關資訊，例如啟用安全氣囊或啟動感測器之相關事實；以及關於車輛操作之其他日常使用資訊，包括但不限於燃油量、剩餘里程狀態、里程表值、距保養時間的狀態、冷卻液液位、清洗液液位、煞車油狀態、煞車片磨損、胎壓、

胎壓感測器故障、引擎失效、機油油位、車門與車窗狀態、安全帶是否繫上，以及如在車中、方向盤上等任何感測器的資訊或攝影機的資訊（包括駕駛室開啟狀態、行李箱開啟狀態、引擎蓋開啟狀態、電池資訊（包括電壓）、排放資訊，以及警報是否啟用或作響）。

- **記錄資訊：**就本「隱私權政策」，「**記錄資訊**」為列出了您在使用資訊娛樂裝置與其「功能」以及「InControl 服務」，於我方系統所進行之行動或要求的記錄檔案。我們會自動收集與儲存關於從車輛撥打之「SOS 緊急通報」與「優化道路救援」通話資訊（包括日期、時間長度、通話內容與通話次數）（「**通話記錄資訊**」），下方詳述了對此等資料的使用。在您存取「My InControl 網站」、使用資訊娛樂系統或「功能」、連結 SIM 卡或配對裝置時，我們可能會自動收集與儲存特定資訊至伺服器記錄中，包括但不限於網際網路協定（IP）位址、網際網路服務供應商（ISP）、點選流資料、瀏覽器類型與語言、檢視之頁面與退出頁面，以及日期或時間戳印（「**網站記錄資訊**」）。我們亦可能會收集並儲存您使用「InControl Remote 應用程式」服務及車輛發送至「InControl Remote 應用程式」（「**應用程式記錄資訊**」）的車輛狀態訊息，以及您使用車輛資訊娛樂系統、插入的 SIM 卡或配對裝置（「**裝置資訊**」）的相關資訊。
- **安全驗證：**車輛識別資料與驗證 Token。
- **功能資訊：**功能專屬資訊，例如針對您使用的「功能」，您選擇送出的最愛、註記、媒體與資訊；內容摘要使用相關資訊；使用者設定，例如啟動「記住我」功能；安全驗證資料；本地化資訊，例如時區、語言與國家或地區；車輛製造商與品牌；相關「記錄資訊」。
- **「記住我」或「記住 Pin」功能：**您的車輛具備「記住我」或「記住 Pin」功能，適用於特定的「InControl Package」功能。若啟動此功能，則可讓您在車輛中維持自動登入，更便於存取功能。請注意，啟用此功能時，使用車輛的任何其他人員將可存取您在車輛中儲存的設定、「功能」與個人詳細資料，且可像您一樣使用車輛的「InControl 服務」。若您不希望其他使用者有存取權，您有責任確保「記住我」或「記住 Pin」功能已停用，且已登出相關功能。
- **行銷資料：**若有適當通知並符合適用之資料保護法規，我們可能會直接或從代理商或其他第三方合作廠商處接收您的聯絡方式、行銷偏好或其他資訊。我們只會在獲得您的同意或您表示不反對的情況下，依據香港法例《個人資料（私隱）條例》（第 486 章）法例內的直接促銷目的定義，使用您的個人資料。關於這些內容之詳細資訊，請參閱以下第九節（您的資料保護權利）中的資料保護權利。
- **資料的公開來源：**我們可能會使用公開來源資料，以支援功能或服務（例如：支援認證或詐欺檢查），以及／或維護我們所持有資料的準確度。
- **第三方資料：**我們可能會按以下第五節中說明的方式，自第三方接收資料。
- **資訊娛樂系統功能及軟體更新：**我們可能會使用持有資料（例如：VIN）以記錄偏好選擇，支援我們提供的「軟體更新」，以及處理「軟體更新」相關疑問及任何必要的業務要求。

我們可能會將「旅程資訊」與「送出資訊」建立關聯，並且根據本「隱私權政策」將該等結合資訊視為個人資料（只要其經結合）。

4. 我們如何使用車輛資料及您的個人資料

我們使用車輛資料及個人資料來管理及滿足服務要求與資料請求，瞭解服務、車輛及「應用程式」的使用情況，作為內部研究及開發使用，並使我們的產品及服務盡可能達到其效果。關於我們處理方式的更多資訊以及相關法律依據，請參閱下方的「告訴我更多」說明框。

告訴我更多...

您的個人資料主要用途：

可能需要收集或處理個人資料的活動：	我們處理的資訊類型：
<ul style="list-style-type: none"> ○ 業界強制／法令要求，例如： <ul style="list-style-type: none"> ▪ 法律強制要求的緊急服務（eCall）。 ▪ 維持功能與服務的網路防護及安全性（包括透過釋出無線軟體更新）。 ▪ 按照法律的強制要求，向適用機關傳達或分享車輛生成的資料。 ○ 傳達緊急安全或產品召回通知 ○ 管理法律及法規要求或法律索賠，包括基於下列目的： <ul style="list-style-type: none"> ▪ 遵守我們的法律義務或維護我們的合法權利。 ▪ 預防／偵查犯罪（包括經要求而協助如警方、駕駛與運輸署或任何其他公家機構或刑事調查機構等執法單位） 	<ul style="list-style-type: none"> ▪ 送出資訊 ▪ 車輛識別資訊 ▪ 位置資訊 ▪ 旅程資訊 ▪ 車輛操作資訊 ▪ 記錄資訊 ▪ 公開來源的資料 ▪ 第三方資料。 ▪ 裝置資訊
<ul style="list-style-type: none"> ○ 設定與操作車輛功能及服務（包括透過第三方功能供應商）： <p>請您特別注意：</p> <ul style="list-style-type: none"> ▪ 為了提供您已註冊或要求的定位式功能與服務，我們會對於「位置資訊」進行必要的處理。 ▪ 「語音資料記錄資訊」將嚴格基於運行聲控功能及服務之所需，與相關服務供應商進行處理與共享。 ○ 維護功能與服務（包括透過釋出無線軟體更新）： <ul style="list-style-type: none"> ▪ 識別錯誤模式、問題修復以及診斷和預測問題。 ▪ 解決問題、查詢和投訴（包括管理保固相關問題）。 ○ 網路及資訊安全： <ul style="list-style-type: none"> ▪ 維護我們的網路及平台的資訊安全，廣義而言亦涉及保護您的資訊免於遺失或損壞、盜竊或未經授權之存取。 ▪ 您使用「功能」及登入帳戶時，將使用安全性驗證資料，防止未經授權之存取行為。此資訊為自動在我們的安全驗證供應商與託管服務供應商之間傳達，以確認身分與防止未經授權使用「InControl 服務」的行為。 ○ 服務契約及訂閱的相關通訊 ○ 記錄維護及一般契約／服務管理 	<ul style="list-style-type: none"> ▪ 送出資訊 ▪ 車輛識別資訊 ▪ 位置資訊 ▪ 旅程資訊 ▪ 語音資料記錄資訊 ▪ 車輛操作資訊 ▪ 記錄資訊 ▪ 功能資訊 ▪ 公開來源的資料 ▪ 第三方資料 ▪ 安全與驗證資訊 ▪ 「記住我」與「記住 Pin」功能

<ul style="list-style-type: none"> ○ 回覆客戶諮詢及解決問題（契約前或契約後） <ul style="list-style-type: none"> ▪ 基於內部營運和管理之目的（其中包含例如故障排除、測試、支援我們的審計要求、調查可能的錯誤使用情況，及回應您可能提出的任何諮詢），以及為了支援您的查詢。 ▪ 為了訓練與品質相關目的，以及協助解決爭議，我們可能會記錄與您的通話。 ○ 客戶產品／功能的相關通訊（在此所指涉的是非行銷或促銷性質的通訊，例如提供與簽約服務或功能相關的最新資訊） ○ 車輛健康狀況通知（VHN）： <ul style="list-style-type: none"> ▪ 通知您車輛特定的健康狀況警告狀態。 ○ 行銷與促銷通訊（無須另外取得同意者），例如： <ul style="list-style-type: none"> ▪ 郵寄、電話、行銷或促銷通訊； ▪ 非以個人作為目標之數位或社群媒體行銷； ▪ 與您現有服務相關之服務契約及訂閱的續約／續訂方案； ▪ 與類似產品及服務相關之行銷與促銷通訊， <p>但如果您已選擇退出便不會收到此類通訊。</p> ○ 研究與開發、資料彙總與資料分析： <p>所涉及的目的有：</p> <ul style="list-style-type: none"> ▪ 產品開發與改善； ▪ 識別錯誤模式、必要的問題修復、診斷和預測問題；以及 ▪ 評估功能使用情況、趨勢及偏好 <p>其中包括為了進一步研究／分析／統計而將資料匿名化的流程（包括但不限於基於網路及資訊安全的目的）。</p> ○ 改善您的網站、資訊娛樂及整體的客戶體驗： <ul style="list-style-type: none"> ▪ 改善並簡化您在 Jaguar Land Rover 網站上的體驗、車內體驗、應用程式內部功能（例如：偵測螢幕大小，以使畫面符合您用以存取之「裝置」的大小），以及支援您使用個人化網站區域（包括在您存取及使用「客戶入口」的過程中，及在您的單一登入驗證程序中所進行的處理作業）。 ▪ 預先填入網站資料欄位，以提升並簡化您的線上體驗。 ○ 驗證您車輛所有權之變更並協助解除綁定您的 InControl 帳戶 ○ 記錄維護及一般管理： <ul style="list-style-type: none"> ▪ 維護我們的記錄、管理並維護我們的服務、應用程式、網站及車內功能。 ▪ 支援您的查詢，及任何其他內部營運與管理目的（例如：將包括故障排除、測試、支援我們的審計要求，及回應您可能提出的任何諮詢，包括您所提出的任何資料保護權利）。 	<ul style="list-style-type: none"> ▪ 送出資訊 ▪ 車輛識別資訊 ▪ 行銷資料 ▪ 位置資訊與旅程資訊（根據法律須取得同意者除外） ▪ 車輛操作資料 ▪ 裝置資訊 ▪ 第三方資料 ▪ 記錄資訊 ▪ 通話記錄資訊 ▪ 應用程式記錄資訊 ▪ 安全與驗證資料 ▪ 公開來源的資料
---	--

<p>為了訓練與品質相關目的，以及協助解決爭議，我們可能會記錄與您的通話。</p> <p>○ 企業收購與出售</p>	
<p>○ 資料彙總、分析與剖析：</p> <p>我們會依照前述內容進行研究及分析活動，為我們的行銷策略提供資訊，更加瞭解我們的客戶及網站訪客；支援我們的網站廣告，並更有效地改善我們提供的網站訊息、功能及服務。如果我們要依照下方進一步說明的內容，將這些活動的成果用於剖析及客製行銷的目的，我們會尋求您的同意。</p> <p>○ 行銷與促銷通訊：</p> <ul style="list-style-type: none"> ▪ 我們可能會針對您可能有興趣的產品或服務，向您發送相關的行銷通訊，包括以電子方式為之（例如：電子郵件、文字訊息、數位或社群媒體等）。 ▪ 我們也可能與獨立第三方網路共享您的詳細資訊，以便透過電子方式發送行銷通訊。 ▪ 我們可能會為了客製行銷之目的使用 Cookie（請參閱我們的 Cookie 政策）。 <p>○ 將位置資訊用於研究與開發、資料彙總與資料（若法律規定使用非彙總／明確地理位置資料需取得同意的場合）</p> <p>○ 無線軟體更新：</p> <ul style="list-style-type: none"> ▪ 為您的車輛安裝與您所訂閱的服務無關或其他需要使用者事前同意始得安裝的無線更新。 <p>附註：在我們徵得您的同意開始為了上述任何目的收集您的個人資料後，您可隨時撤銷您向我們提供的同意，以禁止我們使用您的資訊。請參閱下文第九節中「撤銷您的同意」之說明，以瞭解詳細資訊。您的撤銷同意權不影響於撤銷前基於該同意之資料處理的合法性。</p>	<ul style="list-style-type: none"> ▪ 送出資訊 ▪ 車輛識別資訊 ▪ 車輛操作資料 ▪ 位置資訊 ▪ 旅程資訊 ▪ 車輛操作資訊 ▪ 第三方資料 ▪ 行銷資料

5. 我們與誰共享個人資料

我們可能與以下人員共享您的個人資料（該等人員可能也會收到有關您和您車輛的資訊）：

- 需要處理資料之第三方，包括供應商（詳見下文）、第三方應用程式、導航及其他「功能」供應商，以及車輛與訂閱相關服務供應商（包括但不限於語音助理「功能」與服務、財務、保險、保固、租賃／租用），以及「InControl 服務」供應商，以向您提供您有資格取得、已註冊或要求的產品及服務，或適用於您車輛的產品和服務（例如「InControl 服務」、「功能」、可用的車輛服務與「軟體更新」），並且監控前述項目之使用與性能。
- 為了啟用第三方服務與「功能」，您可能需要將您的 InControl 帳戶連結至適用的第三方帳戶。若您選擇連結帳戶，我們得分享特定的「送出資訊」、「車輛識別資訊」、「位置資訊」、「旅程資訊」、「車輛操作資訊」、「記錄資訊」和／或第三方服務供應商要求的「功能」資訊，以便讓其為您提供

您選擇啟用的服務或「功能」。請參閱相關第三方的隱私權政策，以瞭解關於其服務如何處理個人資料的資訊。

- 為了提供您「InControl 服務」：我們的遠端資訊處理服務供應商、緊急服務、我們的道路救援供應、我們的遭竊車輛追蹤功能供應商、地方主管機關、我們的託管服務供應商、「InControl 服務」行動網路營運商、我們的匿名分析服務供應商及我們的行銷服務供應商。
- 為了處理您的「InControl 服務」及其他訂閱之續訂，亦需向我們的電子商務服務供應商揭露您的「InControl 服務」訂閱相關資訊。包括車輛識別資訊及個人資料，如您的姓名、地址、電話號碼及電子郵件地址。我們使用第三方支援我們的管理功能，讓我們得以處理並切換訂閱服務訂單。我們會將共享的資料限定為提供服務的必需資料。
- 為了從我們的代理商網路、授權服務廠及相關進口商網路（統稱為我們的「銷售網路」）收到關於您的資訊以及與您相關之車輛的資訊，以便滿足對商品、服務等要求並向您傳達相關資訊，以及進行評估與培訓，藉此提升您在與我們的「銷售網路」互動時可獲取的服務品質。
- Jaguar Land Rover 集團企業符合本「隱私權政策」中的資料使用規定。
- 我們出售或購買任何業務或資產的第三方。
- 若為了遵守任何法律或法規義務或要求，或在法律或法律豁免允許範圍內（包括但不限於為以下目的所進行之揭露：基於法律程序、為取得法律意見或為確認、行使或保衛法律權利、預防或偵查犯罪、逮捕或起訴罪犯）；或為了執行我們的契約條款、調查實際或可疑之違規行為，或為了保護 Jaguar Land Rover 或其客戶之權利、財產或安全，而負有義務揭露或分享您的個人資料。
- 若您的車輛係由企業或其他組織擁有、租賃或管理，我們將向第三方揭露「車輛識別資訊」，使其得以管理、更新及取消其車隊中車輛的「InControl Package」訂閱。

我們與我們的服務供應商設有防護措施，以確保您的資料安全無虞，且僅用於本「隱私權政策」所述之目的。告訴我更多...

...關於 JLR 之獨立第三方網路...

我們與眾多獨立第三方合作以提供服務，例如我們的「銷售網路」、信貸產品供應商、契約租賃產品。個人資料可能會由您直接發送給該類實體（例如：您透過電話或電子郵件或該類實體之網站頁面與其聯絡），或由我們於適當時間與其共享個人資料，以支援您的查詢或其他服務要求。

當您使用 Jaguar Land Rover 網站查詢或聯絡我們的「銷售網路」、信貸供應商或契約租賃產品供應商時，則其應為（除非另有說明）獨立企業，且非 Jaguar Land Rover 集團企業。您向該類實體所做出的任何聯絡（例如：致電或發送電子郵件），以及您使用其網站時提供的任何資料，均應由該類實體控制，而非由 JLR 控制。若您對第三方（如：代理商、進口商、信貸供應商、契約租賃產品供應商或維修商）使用您的個人資料有所疑問，我們建議您直接與其聯絡。

關於與我們合作的獨立第三方之資訊：

就 Jaguar 而言：

- 我們的「銷售網路」通常可透過「尋找授權代理商」的網站功能進行識別。可透過名稱、位置或郵遞區號搜尋。可於此處查詢所有香港授權代理商的完整名單：<https://www.jaguar.com.hk/dealer-locator>

就 Land Rover 而言：

- 我們的「銷售網路」通常可透過「尋找授權代理商」的網站功能進行識別。可透過名稱、位置或郵遞區號搜尋。可於此處查詢所有授權代理商的完整名單：<https://www.landrover.com.hk/dealer-locator>

...關於供應商...

我們利用多家服務供應商支援我們的業務，這些服務供應商可存取我們的系統及資料，以便向我們及代表您提供服務，例如付款處理器、託管或雲端服務供應商等資訊科技、行銷、分析及數位廣告支援服務、汽車連線技術供應商，包括車輛內容支援、驗證服務、客戶服務及關係處理、服務及系統專家、管理或支援服務、網站分析支援。

...關於 JAGUAR LAND ROVER 集團企業，以及其如何提供服務支援...

身為塔塔集團企業的一員，我們可以從更廣大企業結構中的大型 IT 基礎設施及專業知識中獲益。這表示您提供給我們的個人資料，僅於必要時由我們的企業集團成員存取，以用於服務及系統之維護與支援、彙總分析、業務連續性、IT 及管理目的。例如，在必要時支援特定網站查詢，或提供維護網站功能的技術支援。

...關於公共機構、執法單位及監管機構...

警察、其他執法單位及監管機構得隨時要求提供個人資料，例如為了預防或偵查犯罪、逮捕或起訴違法者。

6. 國際資料傳輸之相關資訊：

我們從您收集的資料將儲存在英國（UK）與歐洲經濟區（「EEA」）與／或其他國家／地區，以因應我方或我們的服務供應商為提供車輛與「InControl 服務」所需。該等資料可能由在 UK 與 EEA 境內、中華人民共和國境內及／或其他國家／地區境內作業的人員處理，該等人員為我方或我們其中一家服務供應商工作，包括參與提供「InControl 服務」的相關者。若在香港境外分享個人資料，進行該等個人資料分享作業時則會遵守屆時香港境內現行之適用法規。我們會使用保護措施以加入適用此類資料傳輸的資料保護。同意本「隱私權政策」，代表您同意依照本第六節所述方式，傳輸您的資料。

告訴我更多...

...關於 JAGUAR LAND ROVER 為國際資料傳輸所做的適足性檢查...

若 JAGUAR LAND ROVER 選擇與位於香港以外的第三方分享個人資料，則會評估以下因素以支持該資料的適當傳輸：

- **內部檢查，確定是否有歐盟執委會的任何適用適足性決議存在。**我們擁有集團企業，並使用位於歐盟執委會批准，具有實質相同資料保護法規國家／地區之集團企業及供應商。截至本「隱私權政策」發布日，這些國家的完整名單如下：安道爾、阿根廷、加拿大、法羅群島、根息島、以色列、瑞士、日本、澤西島、紐西蘭、烏拉圭及曼島。（歐盟—美國隱私盾保護計劃說明如下）。關於歐

盟執委會考量的保護措施清單及資訊，請參閱：https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en。

- **使用歐盟執委會批准之措施支援個人資料的適當傳輸：**我們亦擁有集團企業，並使用位於世界其他國家與地區的供應商。為了管理資料保護是否符合該類傳輸，我們使用歐盟執委會或英國批准的資料傳輸機制，例如使用批准的示範契約條款。我們也會在適用情況下，評估供應商是否能向我們證明自身擁有「具拘束力企業規則」。（「具拘束力企業規則」為 GDPR 認可的「資料保護」機制，以確保適當的個人資料傳輸）。我們可能會與有能力向我們證明已獲得「隱私盾」認證的供應商合作，因為此認證可視為具有適當的傳輸方法。
 - 欲瞭解歐盟執委會批准之示範條款中所要求的保護措施，可於此處取得該類保護措施之範本：https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en。
 - 請使用以下連結查詢已批准的「具拘束力企業規則」完整列表：https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_en。
 - 關於「隱私盾」參與者的完整列表及其「隱私盾」認證資訊，請參閱：<https://www.privacyshield.gov/welcome>。

7. 我們持有個人資料的時間長度

只要我們需要您的個人資料，以提供您註冊的產品及服務時，便會保留您的個人資料。我們亦會遵守自身法律義務，履行服務或契約承諾，答覆疑問及解決任何爭議，滿足我們的合法利益並執行自身權利。

我們用於確定個人資料儲存期限的標準包括以下內容：有效的契約條款、法律規定之時效期、適用之法規要求及產業標準。

8. 保持您的資訊安全

我們會合理採取所有必要步驟，以確保安全處理您的資料，並遵守本「隱私權政策」。

我們要求所有服務供應商皆採行適當措施，以維護您資訊的安全，且該等服務供應商僅可為了提供所同意的服務而存取與使用您的資訊。

若我們向您提供（或由您選擇）密碼以存取「My InControl 網站」，您有責任將該密碼保密。請勿與任何其他人士分享您的密碼。我們不會將登入憑證儲存至您選擇連接之第三方服務上，我們只會以安全的方式儲存驗證 Token。

但因為網際網路及電子通訊的本質之故，透過這類管道傳輸資訊並非完全安全。雖然我們盡最大努力保護您的個人資料，我們無法保證您透過網際網路傳輸的資料安全無虞；任何傳輸皆由您自負風險。您的資訊會保存在結合使用實體措施與技術措施保護的安全環境中，如加密技術或驗證系統，以防止任何損

失、誤用、修改、透露、破壞、盜竊或未經授權的存取。若您的車輛配有網路瀏覽器，建議您謹慎使用，並只存取您信任的網站。

9. 您的資料保護權利：

您擁有與您的個人資料相關之權利，包括：撤銷您已給予的同意、接收通知且有權存取您的個人資料、更正或補全不正確的資料，及於特定情況下限制、請求刪除、反對處理或請求將您的個人資料移至另一組織。

您可隨時透過「My InControl 網站」或「Remote 應用程式」更新您的個人資料。

我們努力確保提供最佳水準的客戶服務。若您確實需要，或基於任何資瞭保護權利方面的原因想與我們取得聯絡，請使用以下的客戶關係電子郵件地址與我們聯絡，並加上與您的資料保護權利相關之主旨標題。

- apcr@jaguarlandrover.com

若您不滿意，想針對資料保護進行投訴，請透過以下電子郵件地址直接與我們的資料保護專員聯絡：DPOffice@jaguarlandrover.com。若您仍不滿意，您亦有權向監管機構投訴。

若想瞭解關於資料保護權利的更多資訊，請參閱下方的「告訴我更多」說明框。

告訴我更多...

...關於我的資料當事人權利...

若您已同意我們處理您的個人資料，包括電子行銷通訊，您有權隨時撤銷該同意。只需使用所顯示的取消訂閱選項即可，例如：顯示於我們發送的電子行銷通訊郵件中的取消訂閱選項。

- 您可要求存取我們持有之您的個人相關資料、反對對其進行處理、要求我們更正任何錯誤、限制或停止處理，或將其刪除。若您要求我們刪除或停止處理，我們不一定總是按您的要求處理。若發生此情況，我們將會解釋原因。
- 特定情況下，您可要求我們以可用之電子格式向您提供您的個人資料，並將其傳輸至第三方（資料移轉權）。該權利僅適用於特定情況。該權利不適用時，我們將會解釋原因。

...我如何與英國監管機構聯絡...

資訊專員辦公室（「ICO」）是英國境內負責監管個人資料的監管機構。您可透過下列任何方式與「ICO」聯絡：

- 前往其網站：www.ico.org.uk
- 致電 0303 123 1113

- 或撰寫信函寄至下列地址：Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF。

10. 本政策的變更

本「隱私權政策」之更新請參閱：<https://incontrol.jaguar.com/jaguar-portal-owner-web/about/privacy-policy/HKG> 與 <https://incontrol.landrover.com/jlr-portal-owner-web/about/privacy-policy/HKG>。在「My InControl 網站」上亦會張貼通知與更新的「隱私權政策」。

11. 往第三方服務與其他網站的連結

「My InControl 網站」可能包含我們無法控制、由其他組織營運的其他網站連結。本「隱私權政策」不適用於其他網站，因此我們建議您閱讀其隱私權聲明。請注意，本政策亦不適用於第三方服務及網站，一般包括您在使用「InControl Package」時，或直接向第三方註冊應用程式或服務時可能存取之服務或網站。請務必參考相關第三方之隱私權政策。我們不對其他網站及應用程式的隱私權政策及做法負責（即使您是透過我們所提供的連結存取）。我們僅為了您的資訊與便利，才提供那些網站連結。我們特別聲明對其內容、隱私權做法及使用條款不承擔任何責任，亦不對其準確性、內容或縝密性做出任何認可、聲明或承諾。

12. 英文與中文版本

如果本「隱私權政策」的英文版本與中文版本不一致，將以英文版本為準。

COOKIE 政策

Cookie 是僅含文字的資訊相關字串，網站會將其傳輸至您電腦硬碟的瀏覽器 Cookie 檔案，讓網站可記得您是誰。Cookie 可協助網站更快速地配合您偏好的興趣編排內容，大部分大型網站皆使用 Cookie。單獨使用 Cookie 無法識別出您。Cookie 一般包含 Cookie 的來源網域名稱、Cookie 的「壽命」，以及一個值，這通常為隨機產生之獨一無二的數字。

我們使用兩種類型的 Cookie，如下表所述。

- **工作階段 Cookie**：此為暫時性 Cookie，會在您瀏覽器的 Cookie 檔案中保留至您離開網站為止；
- **永久性 Cookie**：這保留在您瀏覽器的 Cookie 檔案中的時間更長（不過時間長度為根據特定 Cookie 的壽命而定）。

工作階段 Cookie 用於：

- 讓您可將資訊傳送至我們網站的不同頁面，無需重新輸入資訊；
- 讓您可在註冊期間存取儲存的資訊。

永久性 Cookie 用於：

- 在您返回我們的網站時，協助我們識別您為獨一無二的訪客（使用號碼，無法識別您個人身分）；
- 讓我們可配合您偏好的興趣，量身訂做內容或廣告，或避免向您重複顯示相同的廣告；
- 編譯匿名與彙總的統計資料，允許我們瞭解使用者如何使用我們的網站，並協助我方改善網站結構。我們無法以此方式識別出您個人。

My InControl 網站

「My InControl 網站」與 InControl 網頁使用 Cookie 來區分您與其他「My InControl 網站」使用者。這有助我們為您提供良好的「InControl 服務」使用體驗，並且也讓我們能改善「InControl 服務」。

您能夠透過修改瀏覽器設定以接受或拒絕 Cookie。但是，若停用 Cookie，您可能無法使用所有服務互動功能。

下方列出我們在「My InControl 網站」使用的主要 Cookie，以及我們將其用於何種用途。

Cookie 名稱	Cookie 類型	Cookie 用途	期間
cookieInfoShownDealer	永久性	此 Cookie 會儲存向您顯示 Cookie 政策通知的相關資訊。	從您第一次與網站互動後的 2 個月內。
JSESSIONID	工作階段	在您使用網站的工作階段期間，此 Cookie 會暫時儲存您輸入的資訊，讓網站的部分功能於您在頁面之間移動時仍可運作。	從您使用網站後的 30 分鐘內。
cookieInfoShown	永久性	此 Cookie 會儲存向您顯示 Cookie 政策通知的相關資訊。	從您第一次與網站互動後的 1 日內。
jlr-remember-me	永久性	只有當您在登入時選擇讓入口網站記住您之際，才會使用此 Cookie。其會儲存 Token 以供識別。	從您第一次與網站互動後使用網站的期間。
jlr-remember-me-login-name	永久性	只有當您在登入時選擇讓入口網站記住您之際，才會使用此 Cookie。其會儲存您的使用者名稱以供識別。	從您第一次與網站互動後使用網站的期間。
jlr-selected-locale	永久性	此 Cookie 會儲存您偏好使用何種語言檢視網站。	從您第一次與網站互動後使用網站的期間。
Google Analytics（分析）	永久性	我們使用 Google Analytics（分析）編譯匿名與彙總的統計資料，以允許我們瞭解使用者如何使用我們的網站，並協助我方改善網站結構。此資料不會識別出您個人。請參閱 www.google.com/policies/privacy/partners 及	從您與網站互動後的 2 年內。

<https://tools.google.com/dlpage/gaoptout>
以取得更多資訊。

您可啟動瀏覽器的設定以拒絕設定所有或部分 Cookie，藉此刪除與封鎖來自「My InControl 網站」的所有 Cookie。如果您使用的瀏覽器設定為封鎖 Cookie，您可能會發現我們網站的部分元件無法正確運作。

Pivi 資訊娛樂系統

Pivi 資訊娛樂系統使用分析工具（包括第一方 Cookie）以瞭解您的使用情況，並協助我們改善與識別 Pivi Pro 「功能」的問題。您能夠透過修改 Pivi 資訊娛樂系統設定以接受或拒絕 Cookie，且您可隨時在車輛設定中變更您的選擇。

下方列出我們使用的主要 Cookie，以及我們將其用於何種用途。

Cookie 名稱	Cookie 類型	目的	期間
fs_uid	永久性	此 Cookie 會儲存在外部，並用於追蹤使用者識別資訊	在第一次使用已啟用應用程式後的 1 年後過期。
fs_session	工作階段	此 Cookie 會儲存工作階段資訊以供分析之用	在第一次使用已啟用應用程式後的 30 天後過期。
fs_csrf_token	永久性	此 Cookie 會儲存 Token 以供識別	在第一次使用已啟用應用程式後的 30 天後過期。
fs_trusted_device	永久性	此 Cookie 包含關於 Pivi 系統的裝置資訊，以建立安全的連線	在第一次使用已啟用應用程式後的 60 天後過期。
fs_last_activity	永久性	此 Cookie 會儲存關於現行工作階段的資訊，以協助工作階段逾時情況。	在關閉「功能」時過期。

應用程式分析

我們使用分析工具編譯匿名與彙總的統計資料，好讓我們瞭解客戶如何使用「應用程式」，並協助我方進行改善。這包括記錄「應用程式」當機與故障的情況以供品質保證之用，以及「應用程式」使用情況。此資料不會識別出您個人。您可透過帳戶設定，在「應用程式」上選擇停用「應用程式分析」。

InControl Privacy Policy
Last updated: 30.11.2023

STATEMENT OF POLICY

Jaguar Land Rover is one of the world's leading producers of premium cars. Innovation and design give our customers experiences they love for life – anticipating and exceeding their needs and expectations. Quality and excellence are our hallmarks. Taking care of our customers is paramount.

We respect the privacy of every individual whose information we process. This Privacy Policy explains how we use personal data received from your use of the My InControl Services, and use of our vehicles (referred to as 'vehicles' throughout this Privacy Policy), products and services. Jaguar Land Rover is committed to protecting the privacy, confidentiality and security of the personal data we handle. We comply with the requirements of applicable data privacy laws and ensure that all our employees and agents uphold these obligations as explained in this Privacy Policy.

DATA PROTECTION INFORMATION

1. DATA CONTROLLER INFORMATION: WHO WE ARE AND HOW TO CONTACT US

Who We Are: When we refer to 'Jaguar Land Rover', 'JLR' 'we', 'our' or 'us' in this Privacy Policy, we refer to the data controller: Jaguar Land Rover Limited, whose registered office is at: Abbey Road, Whitley, Coventry CV3 4LF, England, and whose registered number in England is: 1672070.

If you want to find out more about the Jaguar Land Rover group, please have a look at the "Tell me more" box below.

Customer Relationship Centre contact details: For any queries relating to this Privacy Policy or the products and services included with it, you can email us at: apcr@jaguarlandrover.com

TELL ME MORE ...

... about the JAGUAR LAND ROVER Group ...

Jaguar Land Rover is part of a group of companies whose parent company is Jaguar Land Rover Automotive plc. You can find out more corporate information about Jaguar Land Rover on our website at: <https://www.jaguarlandrover.com/>.

Jaguar Land Rover is part of the Tata group. More information about the Tata group and the Tata companies can be found here: http://www.tata.com/aboutus/sub_index/Leadership-with-trust and <http://www.tata.com/company/index/Tata-companies>

2. WHAT THIS PRIVACY POLICY APPLIES TO

- This Privacy Policy will apply to your use of:
 - the "InControl Remote App" is the smartphone application ("App") that you have downloaded from the Online Store onto your smartphone or handheld device (collectively referred to as

“**Device**”) which enables you to use the ‘Remote Essentials’ features and, depending on your subscription, the ‘Remote / Remote Premium’ features;

- the My InControl website from which you can access your InControl Services account and access certain InControl Services;
- any of the following “InControl” services (depending on your vehicle model and subscription): (i) the services provided via the InControl Remote App and the My InControl website; (ii) the “SOS Emergency Call” services; (iii) the “Optimised Roadside Assistance” services; (iv) “InControl Secure Tracker / Secure Tracker Pro” services; and (v) any linked or InControl available apps and services (“**InControl Services**”);
- the Infotainment system, including the InControl Touch Pro and Pivi Pro Features; (The use of the word “Features” in this Privacy Policy applies to vehicles equipped with InControl TouchPro or Pivi Pro and cover the infotainment, connected services and software update features and the “Live” services (including all software, images, text, data and other content forming part of or relating to those features); and
- other connected vehicle systems and services.

Please note that this Privacy Policy does not apply to third party websites which you may access in connection with your use of the InControl Services or otherwise, or to services or features which you sign up to receive directly with a third party – please refer in these cases to the relevant third party’s privacy policy.

This Privacy Policy sets out the basis on which data, including any personal data we collect from you, or that you provide to us, will be processed by us, following your use of the My InControl website, or our vehicles, products and services described in this Section 2. Please read it carefully to understand our practices regarding data collection and your personal data and how we will treat it.

Please be aware that it is your responsibility to alert all passengers and people you authorise to use your vehicle, the infotainment system and/or the InControl Services about the privacy practices described in this Privacy Policy (including the ways in which we may collect and use data from the vehicle and/or relating to users of the vehicle).

3. THE TYPES OF INFORMATION WE COLLECT

We may collect and process the following data about you and/or your vehicle(s):

- **Submitted Information:** information that you provide by filling in online forms during the setup of your InControl Services account, or during your use of the My InControl website and InControl Services, via your use of your vehicle’s infotainment system and its Features, information which you may otherwise provide to us directly (for example, when you communicate to us via telephone or email or through one of the My InControl website forms), or that which the authorised retailer (from whom you purchased or leased the vehicle) provides on your behalf when setting up your InControl Services account, or otherwise in connection with, or following up on, any other communication with you. This information will depend on the nature of your actions, but may include your name, address, telephone number (including smartphone number), e-mail address, language preference, password and PINs for your InControl Services account, your vehicle infotainment choices and preferences, and information about your preferred authorised retailer(s).

- **Additional Information:**
 - if you contact us, we may keep a record of that correspondence; and
 - details of transactions you carry out through the My InControl website.

- **Device Information (including location):** We may collect information about the Device or any computer you may use to access our websites, or download a copy of the InControl Remote App onto your smartphone Device, including the operating system, make, model and version, the InControl Remote App installation unique identifier, the Device's locale settings and country code. The InControl Remote App may also collect information about the location of your device and tokens and username for identification, but this information will not be transmitted to us. The consents you provide to download the InControl Remote App include consent for use of GPS or location data for app services, including map information. You can restrict the access to, or collection of, your Device's location by disabling the location features of your Device or by not using the features of the Device that require location information. Please note, this may have an impact on the App services that are available to you. Our Apps may offer you the choice to enable the use of your Device's fingerprint or retina scan technology to validate your identity within the App, in such cases we will not collect your fingerprint or retina scan information, we will only receive confirmation from your Device that the validation check was successful. More information on Device data, automated data collection and cookies can be found in our Cookies policy below.

- **Vehicle Identification Information:** information about the vehicle(s) that you have registered to the InControl Services or such other vehicle that is otherwise identified to us (for example, via a retailer) as connected with you, including the Vehicle Identification Number (VIN), the make, model, model year, features, registration number, date of purchase or lease, and the authorised retailer from whom you purchased or leased the vehicle.

- **Location Information:** In order to provide you with the InControl Services it is necessary for us and our service providers to make use of location data sent from your vehicle, including information about its last parked location. We will also collect and process other location information about the vehicle at any point in time as part of the "journey tracking" function ("**Journeys**") of the InControl Services. The information that we will collect and process as part of this function is set out in "Journey Information" below. The last parked location of the vehicle will always be tracked and cannot be switched off for the period you receive InControl Services. Subject to this, you are able to switch off Journeys at any time via the My InControl website and the InControl Remote App. If, however, the "SOS Emergency Call", the "Optimised Assistance" or the "InControl Secure Tracker / Secure Tracker Pro" function is activated, real-time location data relating to the vehicle will be activated automatically upon occurrence of a relevant trigger event, such as your vehicle being towed away with the ignition off, moved in a way that triggers "InControl Secure Tracker / Secure Tracker Pro" or the deployment of your vehicle's airbags respectively, and sent to the relevant service provider and/or emergency services (as appropriate) even if you have switched off Journeys. For full details of the relevant trigger events please refer to the vehicle handbook. Location Information is also necessary (separate to "Journey Information" functionality), for use of certain InControl Services and Feature functionality including: locating your vehicle on a map and getting walking directions back to it, and locating your vehicle in a crowded car park with the 'beep and flash' functionality. **Even if you have not activated**

your InControl Services account, the vehicle may automatically initiate a call to contact emergency services via the limited emergency call function or you may be able to manually initiate a voice call for emergency services via the limited emergency call function. The occurrence of such a call may transmit information, including vehicle location, time, and a vehicle identifier to us and/or our emergency service providers as described in your vehicle handbook which can be found here: <https://www.ownerinfo.jaguar.com> and <https://www.ownerinfo.landrover.com>.

- **Journey Information:** information about your journey sent from your vehicle including the journey distance, real-time location, the duration of the journey, the average speed and data about the efficiency of the journey. As referred to above, you can turn off Journeys via the My InControl website and the InControl Remote App. This will prevent any of the above information from being sent from the vehicle (except for the last parked location). As stated above, if, however, the “SOS Emergency Call”, the “Optimised Roadside Assistance” or the “InControl Secure Tracker / Secure Tracker Pro” function is activated, location data of the vehicle will be sent to the relevant service provider and/or the emergency services (as appropriate) even if you have switched off Journeys.
- **Speech Data Log Information:** The voice data and Submitted Data that is shared with our voice services providers to allow your voice commands to be responded to, may include the following: audio files, associated transcriptions and log files.
- **Vehicle Operation Information:** this includes technical data related to the vehicle as a product including data regarding vehicle components (e.g. serial number, software version); vehicle quality and maintenance (e.g. diagnostic trouble codes); information about the vehicle being involved in an accident such as the fact that the airbags have been deployed or the sensors have been activated; and information about the operation of the vehicle throughout the course of its day-to-day use, including, but not limited to, the fuel amount, the distance to empty status, the odometer value, the distance to service status, the coolant level, the washer fluid level, the brake fluid status, the brake pad wear, the tyre pressure, tyre pressure sensor failure, engine malfunction, the oil level, the door and window status, if seatbelts are buckled or not, and information from any sensors, for example in the car, on the steering wheel, or from camera information, including if the cab is open, boot open, bonnet open status, battery information including voltage, emissions information and whether the alarm is armed or sounding.
- **Log Information:** For the purpose of this Privacy Policy, “**Log Information**” refers to the log files listing actions or requests made to our systems in connection with your usage of the infotainment unit and its Features and the InControl Services. We will automatically collect and store information related to “SOS Emergency Call” and “Optimised Roadside Assistance” calls made from the vehicle (including the date, time duration, content of the call and number of calls made) (“**Call Log Information**”), use made of this data is detailed below. When you access the My InControl website, use the infotainment system, or Features, connect a SIM card, or pair a device, we may automatically collect and store certain information in server logs, including but not limited to internet protocol (IP) addresses, internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and date or time stamps (“**Website Log Information**”). We may also collect and store information related to your usage of the InControl Remote App services and vehicle status messages sent by your vehicle

to the InControl Remote App (“**App Log Information**”) and from your use of the vehicle’s Infotainment system, plugged in SIM card or paired device (“**Device Information**”).

- **Security Authentication:** Vehicle identification data and authentication tokens.
- **Feature information:** feature specific information such as favourites, notes, media, and information you choose to submit to the Features you use; content feed usage-related information; user settings such as activation of ‘remember me’ function; security authentication data; localisation information such as time zone, language and country or region; vehicle make and brand; relevant Log Information.
- **‘Remember me’ and ‘Remember Pin’ functions:** Your vehicle may have a ‘remember me’ or ‘remember Pin’ function for certain features of the InControl Package. This function, if you choose to enable it, enables you to remain automatically logged in on the vehicle for more convenient access to the features. Please be aware that while this function is active any other person using the vehicle will be able to access any of your stored settings, Features and personal details in the vehicle and to use the InControl Services in the vehicle as if they were you. If you do not wish other users to have access, it is your responsibility to ensure the ‘remember me’ or ‘remember Pin’ function is disabled and to log-out from the relevant features.
- **Marketing data:** We may receive from you direct, or receive from retailers or other third party partners, your contact details, marketing preferences or other information, where there is appropriate notice and in compliance with applicable data protection laws. We will only use your personal data for direct marketing purpose within the meaning of the Personal Data Privacy Ordinance of the Laws of Hong Kong (Cap.486) where we have obtained the consent or an indication of no objection from you. Please see your data protection rights at Section 9 (Your data protection rights) below for further information on these.
- **Public sources of data:** We may use public sources of data, for example, to support functionality or services (e.g. to support authenticate or fraud checks), and/or to maintain the accuracy of the data we hold.
- **Third party data:** We may receive data from third parties in the ways we explain in Section 5 below.
- **Infotainment System Features and Software Updates:** We may use held data (such as VIN) to record preference choices, to support with our provision of Software Updates, and to deal with queries and any necessary business requirements in connection with provision of Software Updates.

Please be aware, we may associate Submitted Information with the other information detailed above, and where we do so, we will treat the combined information as personal data in accordance with this Privacy Policy for as long as it is combined.

4. **HOW WE USE VEHICLE DATA AND YOUR PERSONAL DATA.**

We use vehicle data and personal data to manage and meet service requirements and information requests, to understand service, vehicle and App use, for internal research and development purposes, and to make our products and services as effective as possible. For more information on our processing, and the legal grounds that are relevant, please see the “Tell me more” box below.

TELL ME MORE ...

The main uses of your personal data:

Activities that may require the collection or handling of personal information:	The types of information we handled:
<ul style="list-style-type: none"> ○ Industry mandated/legislative requirements such as: <ul style="list-style-type: none"> ▪ Emergency services (eCall) where legally mandated. ▪ Maintaining features and services cyber security and safety (including through the release of software over the air updates). ▪ Communicating or sharing vehicle originated data with applicable authorities as legally mandated. ○ Communication of urgent safety or product recall notice ○ Management of legal and regulatory requirements or legal claims, including for purposes such as: <ul style="list-style-type: none"> ▪ To comply with our legal obligations or defend our legal rights. ▪ For the prevention/detection of crime, (including where required to assist law enforcement agencies such as the Police, the Driver and the Transport Department or any other public authority or criminal investigation body) 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Location Information ▪ Journey Information ▪ Vehicle Operation Information ▪ Log Information, ▪ Public Sources data ▪ Third Party data. ▪ Device Information
<ul style="list-style-type: none"> ○ Set up and operation of vehicle features and services (including through third party feature providers): <p>Note in particular that:</p> <ul style="list-style-type: none"> ▪ Location Information will be processed as necessary for the provision of location-based features and services you have signed up to or requested. ▪ Speech Data Log Information will be handled and shared with relevant service providers strictly for the purposes of operating speech activated features and services. ○ Maintenance of features and services (including through the release of software over the air updates): <ul style="list-style-type: none"> ▪ Identification of failure modes, bug fixes and diagnostic and prognostic issues. ▪ Resolution of issues, queries and complaints (including the management of warranty related issues). ○ Network and information security: <ul style="list-style-type: none"> ▪ To maintain our network and platform information security and more generally to protect your information against loss or damage, theft or unauthorised access. ▪ Authentication data is used for log-in to your accounts with us and for security when you use the Features and with the purpose of preventing unauthorised access. This is automatically communicated between our providers of security authentication and hosting services in order to verify 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Location Information ▪ Journey Information ▪ Speech Data Log Information ▪ Vehicle Operation Information ▪ Log Information, ▪ Feature Information ▪ Public Sources data ▪ Third Party data ▪ Security and Authentication information ▪ 'Remember me' and 'Remember Pin' functions

<p>identity and prevent unauthorised use of our services including InControl Services.</p> <ul style="list-style-type: none"> ○ Service contract and subscription related communications ○ Records maintenance and general contract/services administration 	
<ul style="list-style-type: none"> ○ Responding to customer enquiries and resolving issues (pre or post-contract) <ul style="list-style-type: none"> ▪ For internal operations and administrative purposes (for example, this will include troubleshooting, testing, supporting our audit requirements, investigating potential misuse and in responding to any enquiries you may make) and to support your queries. ▪ We may record calls with you for training and quality purposes and to help resolve disputes. ○ Customer product/feature related communication (where those are not of a marketing or promotional nature, e.g. providing updates regarding contracted services or features) ○ Vehicle Health Notification (VHN): <ul style="list-style-type: none"> ▪ To communicate with you regarding the status of specific health warnings in your vehicle. ○ Marketing and promotional communications (where those do not otherwise require consent) such as: <ul style="list-style-type: none"> ▪ Post, phone, marketing or promotional communications; ▪ Digital or social media marketing where this is not individually targeted; ▪ Service contract and subscription renewal offers regarding your existing services; ▪ Marketing and promotional communications related to similar products and services, <p>except where you have opted-out from receiving such communications.</p> ○ Research and Development, Data Aggregation and Data Analytics: <p>For the purposes of:</p> <ul style="list-style-type: none"> ▪ product development and improvement; ▪ identification of failure modes, required bug fixes, diagnostic and prognostic issues; and ▪ evaluation of feature usage, trends and preferences. <p>This includes the process of anonymising data for the purposes of further research/analytics/statistical purposes (including without limitation for network and information security purposes).</p> ○ Enhancing your website, infotainment and overall customer experience: <ul style="list-style-type: none"> ▪ To enhance and simplify your experience across Jaguar Land Rover websites, in-vehicle experiences, in-app features (for 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Marketing data, ▪ Location information and Journey Information (except where consent is required by law) ▪ Vehicle operation data ▪ Device information ▪ Third Party data ▪ Log information ▪ Call Log Information ▪ App Log Information ▪ Security and Authentication data ▪ Public Sources data

<p>example, to detect screen size to fit the Device you are accessing the service on) and supporting your use of personalised website areas (including processing in your access and use of the 'Customer Portal' and in your single sign-on authentication journeys).</p> <ul style="list-style-type: none"> ▪ Pre-filling website data fields to enhance and streamline your online experience. <ul style="list-style-type: none"> ○ Verify changes to your vehicle ownership and support to unbind your InControl Account ○ Records maintenance and general administration: <ul style="list-style-type: none"> ▪ To maintain our records, administer and maintain our services, apps, websites, and in-vehicle functionality. ▪ To support your queries and any other internal operations and administrative purposes (for example, this will include troubleshooting, testing, supporting our audit requirements and in responding to any enquiries you may make, including any data protection rights you raise). <p>We may record calls with you for training and quality purposes and to help resolve disputes.</p> <ul style="list-style-type: none"> ○ Corporate acquisitions and disposals 	
<ul style="list-style-type: none"> ○ Data aggregation, analytics and profiling: <p>As indicated above, we will carry out research and analytics activities to inform our marketing strategies, to create a better understanding of our customers and visitors; to support our website advertising, and to better improve the website information, functionality and the services we provide. Where we use the output of those activities for profiling and tailored marketing purposes, as further described below, we will seek your consent.</p> ○ Marketing and promotional communications: <ul style="list-style-type: none"> ▪ We may send marketing communications to you including by electronic means (e.g. email, text, digital or social media, etc.), related to products or services that may be of interest to you. ▪ We may also share your details with our network of independent third parties, for sending marketing communications, including by electronic means. ▪ We may use cookies for tailored marketing purposes (please see our Cookies Policy). ○ Use of Location Information for Research and Development, Data Aggregation and Data (where consent is required by law for the use of non-aggregated/specific geolocation data) ○ Software over the Air Updates: <ul style="list-style-type: none"> ▪ To deploy over the air updates to your vehicle where those updates are not related to a service you have subscribed to or otherwise require prior user consent for their deployment. 	<ul style="list-style-type: none"> ▪ Submitted Information ▪ Vehicle Identification Information ▪ Vehicle operation data ▪ Location Information ▪ Journey Information ▪ Vehicle Operation Information ▪ Third Party data ▪ Marketing data

Note: Where we collect your personal data with consent for any of the above purposes, you may withdraw your consent for us to use your information at any time. Please see Withdrawing your consent in Section 9 below for further details. Your right to withdraw consent does not affect the lawfulness of processing that was based on that consent before its withdrawal.	
--	--

5. WHO WE SHARE PERSONAL DATA WITH

We may share your personal data with (and may receive information about you and your vehicle(s) from):

- Those third parties who need to handle it, including suppliers (see more information below), third party app, navigation and other Feature providers and service providers for vehicle and subscription related services (including but not limited to voice assistant Features and services, finance, insurance, warranty, lease/hire), and InControl service providers, so we can provide to you, and monitor the usage and performance of, the products and services you are eligible for, have signed up to or requested, or that are appropriate for your vehicle, for example, InControl Services, Features, available vehicle services, and Software Updates.
- In order to enable third party services and Features, you may be required to connect your InControl account to your applicable third party account. If you choose to connect your accounts, we may share certain Submitted Information, Vehicle Identification Information, Location Information, Journey Information, Vehicle Operation Information, Log Information and/or Feature information required by the third party service provider in order for them to provide the service or Feature you have chosen to enable. Please refer to the relevant third party's privacy policy for information on how their services process personal data.
- For the purposes of providing the InControl Services to you: our telematics service provider, the emergency services, our roadside assistance provider, our stolen vehicle tracking provider, local authorities, our providers of hosting services, the mobile network operator(s) for InControl Services, our provider(s) of anonymised analytics services, and our marketing services provider(s).
- In order to process your InControl Services and other subscription renewals it is also necessary to disclose information that relates to your InControl Services subscription with our eCommerce services provider. This includes vehicle identification information and personal information, such as your name, address, telephone number and e-mail address. We use third parties to support our administrative functions in order to allow us to process and switch on subscription service orders. We will limit the data that is shared to that which is necessary for providing the service.
- In order to receive information about you and vehicles connected with you, from our network of retailers, authorised repairers and where relevant our importers network (together our "Retail Network"), so as to be able to fulfil requests for, and communicate to you about, goods, services, etc., and for assessment and training, to be able to enhance the quality of the services you obtain when interacting with our Retail Network.
- Jaguar Land Rover group companies in line with the data uses set out in this Privacy Policy.
- Third parties in the event we sell or buy any business or assets.

- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or requests, or to the extent disclosure is permitted by legislation or a legal exemption, (including but not limited to, disclosure for the purpose of legal proceedings, obtaining legal advice or establishing, exercising or defending legal rights, the prevention or detection of crime, the apprehension or prosecution of offenders); or in order to enforce our contract terms, to investigate actual or suspected breaches, or to protect the rights, property or safety of Jaguar Land Rover or its customers.
- If your vehicle is owned, leased or managed by a business or other organisation, we will disclose Vehicle Identification Information to the third party to allow them to manage, renew and cancel the InControl Package subscriptions of vehicles in their fleet.

We have safeguards in place with our service providers to ensure that your data is kept securely and used in accordance with the purposes set out in this Privacy Policy. **TELL ME MORE ...**

... about JLRs network of Independent Third Parties ...

We work with a number of independent third parties to provide services, such as our Retail Network, credit product providers, contract hire products. Personal data may be sent directly to these entities by you (for example if you contact them by phone or email or via their website pages), or we may share personal data with them where appropriate to support with your queries or other service requirements.

Where you use the Jaguar Land Rover websites to find or make contact with our Retail Network, a credit provider, or a contract hire product provider, these are (unless otherwise stated), independent businesses and not Jaguar Land Rover group companies. Any contact you make to them (for example, to call or send an email) and any data you provide to them in use of their websites, will be controlled by them, not by JLR. If you have questions regarding a third party's (such as a retailer, importer, credit provider, contract hire product provider or repairer's) use of your personal data, we recommend you contact those parties directly.

For information on independent third parties we work with:

For Jaguar:

- Our Retail Network is generally identifiable from the 'locate a retailer' website functionality. They can be searched for by name, location or postcode. A full list of all Hong Kong authorised retailers is accessible here: <https://www.jaguar.com.hk/dealer-locator>

For Land Rover:

- Our Retail Network is generally identifiable from the 'locate a retailer' website functionality. They can be searched for by name, location or postcode. A full list of all authorised retailers is accessible here: <https://www.landrover.com.hk/dealer-locator>

... about Suppliers ...

We use a number of service suppliers to support our business and these service providers may have access to our systems and data in order to provide services to us and on your behalf, for example payment processors, information technology such as hosting or cloud service providers, marketing, analytics and digital advertising support services, connected car technology providers, including vehicle content support, authentication services, customer services and relationship handling, service and system specialists, administrative or support services, website analytics support.

... about JAGUAR LAND ROVER Group companies, and how they may provide service support ...

As a member of the Tata Group of companies, we can benefit from the large IT infrastructure and expertise that exists within our wider corporate structure. This means that the personal data you provide to us may be accessed by members of our group of companies only as necessary for service and system maintenance and support, aggregate analytics, business continuity, IT and administrative purposes. For example, where necessary to support particular website enquiries, or to provide technical support that maintains website functionality.

... about Public bodies, law enforcement and regulators ...

From time to time, the police, other law enforcement agencies and regulators can request personal data, for example for the purposes of preventing or detecting crime, or apprehending or prosecuting offenders.

6. INFORMATION ABOUT INTERNATIONAL DATA TRANSFERS.

The data that we collect from you will be stored in the United Kingdom (UK) and the European Economic Area ("EEA") and/or other countries / regions to the extent required for us or our service providers to provide the vehicle and InControl Services. It may be processed by personnel operating in the UK and the EEA, the People's Republic of China and/or other countries / regions, who work for us or for one of our service providers, including those engaged in the provision of the InControl Services. Where personal data is shared outside of Hong Kong, such sharing of personal data will be done in compliance with the then prevailing applicable laws in Hong Kong. We apply safeguards to add to the data protections that apply to those data transfers. By agreeing to this Privacy Policy you consent to the transfer of your data in accordance with this Section 6.

TELL ME MORE ...

... about the adequacy checks JAGUAR LAND ROVER puts in place for international data transfers ...

Where JAGUAR LAND ROVER chooses to share personal data with a third party located outside Hong Kong, the following factors are assessed to support adequate transfer of this data:

- **Internal checks to identify the existence or absence of any applicable adequacy decision by the European Commission.** We have group companies, and use suppliers located in countries / regions that have been approved by the European Commission as having essentially equivalent data protection laws. A full list of these countries as at the date of this Privacy Policy is Andorra, Argentina, Canada, Faroe Islands, Guernsey, Israel, Switzerland, Japan, Jersey, New Zealand, Uruguay and the Isle of Man. (The EU-US Privacy Shield programme is described below). This list and information about the protections the European Commission has considered is available here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- **Use of measures like European Commission approved measures to support adequate transfers of personal data.** We also have group companies, and use suppliers located in countries and regions that are elsewhere in the world. To manage data protection compliance with these transfers, we will use European Commission or UK approved data transfer mechanisms such as use of approved model contractual clauses. We will also assess, where applicable, whether a supplier is able to demonstrate to us that they have Binding Corporate Rules. (Binding Corporate Rules is a

GDPR – recognised Data Protection mechanism to ensure adequate personal data transfers). We may work with suppliers who are able to demonstrate to us they are Privacy Shield certified where this is deemed as an adequate method of transfer.

- To understand the protections required in European Commission approved Model Clauses, a template copy of these is available here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.
- To see a full list of approved Binding Corporate Rules, please use the following link: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_en.
- A full list of Privacy Shield participants, and their Privacy Shield certification information is available here: <https://www.privacyshield.gov/welcome>.

7. HOW LONG WE HOLD PERSONAL DATA FOR.

We'll keep your personal data for as long as we need it to provide the products and services you've signed up to. We may also keep it to comply with our legal obligations, meet service or contract commitments, respond to queries and resolve any disputes, to meet our legitimate interests and to enforce our rights.

The criteria we use to determine storage periods include the following: contractual provisions that are in force, legal statutory limitation periods, applicable regulatory requirements and industry standards.

8. KEEPING YOUR INFORMATION SECURE

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

We require all of our service providers to have appropriate measures in place to maintain the security of your information and such service providers will only be able to access and use your information for the purpose of providing the agreed services.

Where we have given you (or where you have chosen) a password that enables you to access your InControl Services account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone else. We do not store login credentials to third party services you have chosen to connect to, we will securely store an authorisation token only.

Unfortunately, due to the nature of the internet and telecommunications, the transmission of information via these channels is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet; any transmission is at your own risk. Your information will be kept in a secure environment protected by a combination of physical and technical measures such as encryption technologies or authentication systems to prevent any loss, misuse, alteration, disclosure, destruction, theft or unauthorised access. Where you have a vehicle with a web browser, you are advised to take care in its use and to only access websites you trust.

9. YOUR DATA PROTECTION RIGHTS.

You have rights in connection with your personal data, including: to withdraw consent where you have given it, to be informed and have access to your personal data, to correct or complete inaccurate data, and in certain circumstances to restrict, request erasure, object to processing, or request portability of your personal data to another organisation.

You may at any time update your personal data held by us via the My InControl website or Remote App.

We try to ensure that we deliver the best levels of customer service. If you do need or want to get in touch with us for any reason regarding your data protection rights, please get in touch using the Customer Relationship email address below, and add into the subject header that it relates to your data protection rights.

- apcr@jaguarlandrover.com

If you are not happy and have a data protection related complaint, please contact our Data Protection Officer directly at this email address: DPOffice@jaguarlandrover.com. If you are not satisfied, you also have the right to complain to a supervisory authority.

To learn more about these data protection rights, see the “Tell me more” box below.

TELL ME MORE ...

... about my data subject rights ...

If you have given us consent to process your personal data, including for electronic marketing communications, you have the right to withdraw that consent at any time. Just use the unsubscribe options presented, for example, these are present in the email marketing communications sent by us.

- You can ask for access to the personal data we hold about you, object to the processing, request that we correct any mistakes, restrict or stop processing or delete it. If you do ask us to delete or stop processing it, we will not always be required to do so. If this is the case, we will explain why.
- In certain circumstances you can ask us to provide you with your personal data in a usable electronic format and transmit it to a third party (right to data portability). This right only applies in certain circumstances. Where it does not apply, we will explain why.

...about how I can get in touch with the UK supervisory authority...

The Information Commissioner's Office (the ICO) is the supervisory authority that regulates personal data in the UK. You can get in touch with the ICO in any of the following ways:

- By going to their website: www.ico.org.uk
- By giving them a call on 0303 123 1113
- or by writing to them at the following address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF.

10. CHANGES TO THIS POLICY

Updates to this Privacy Policy will be displayed here: <https://incontrol.jaguar.com/jaguar-portal-owner-web/about/privacy-policy/HKG> and <https://incontrol.landrover.com/jlr-portal-owner-web/about/privacy-policy/HKG>. A notice will be posted on the My InControl website along with the updated privacy policy.

11. THIRD PARTY SERVICES AND LINKS TO OTHER WEBSITES

The My InControl website may contain links to other websites run by other organisations which we do not control. This Privacy Policy does not apply to those other websites, so we encourage you to read their privacy statements. Please note that this policy also does not apply to third party services and websites more generally, including those which you may access in connection with your use of the InControl package, or when you sign up to an app or services directly with a third party. Please refer in these instances to the relevant third party's privacy policy. We are not responsible for the privacy policies and practices of other websites and apps (even if you access them using links that we provide). We provide links to those websites solely for your information and convenience. We specifically disclaim responsibility for their content, privacy practices and terms of use, and we make no endorsements, representations or promises about their accuracy, content or thoroughness.

12. ENGLISH AND CHINESE VERSIONS

In case of any inconsistencies between the English version and the Chinese version of this Privacy Policy, the English version shall prevail.

COOKIES POLICY

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies can help a website to arrange content to match your preferred interests more quickly - most major websites use cookies. Cookies alone cannot be used to identify you. A cookie will typically contain the name of the domain from which the cookie has come; the "lifetime" of the cookie; and a value, usually a randomly generated unique number.

We use two types of cookies as described in the tables below.

- **Session Cookies**, which are temporary cookies that remain in the cookie file of your browser until you leave the site; and
- **Persistent Cookies**, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

Session Cookies are used:

- To allow you to carry information across pages of our site and avoid having to re-enter information; and
- Within registration to allow you to access stored information.

Persistent Cookies are used:

- To help us recognise you as a unique visitor (using a number, you cannot be identified personally) when you return to our website;

- To allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly; and
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website. We cannot identify you personally in this way.

My InControl website

The My InControl website and the InControl webpages use cookies to distinguish you from other users of the My InControl website. This helps us to provide you with a good experience when you use the InControl Services and also allows us to improve the InControl Services.

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of the service if cookies are disabled.

Below is a list of the main cookies we use on the My InControl website, and what we use them for.

Cookie name	Cookie type	Cookie purpose	Duration
cookieInfoShownDealer	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.	2 Calendar months from first interaction with the site.
JSESSIONID	Session	Within a session of your use of the website, this cookie temporarily stores information you have entered to allow some features of the website to work as you move between pages.	30 minutes from use of the site.
cookieInfoShown	Persistent	This cookie stores information regarding the presentation of the cookie policy notice to you.	1 calendar year from first interaction with the site.
jlir-remember-me	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores a token for your identification.	During your usage of the site from your first interaction with the site.
jlir-remember-me-login-name	Persistent	This cookie is only used if you have chosen to have the portal remember you at log in. It stores your username for identification.	During your usage of the site from your first interaction with the site.
jlir-selected-locale	Persistent	This cookie stores what language you prefer to view the portal in.	During your usage of the site from your first interaction with the site.

Google Analytics	Persistent	We use Google Analytics to compile anonymous, aggregated statistics that allow us to understand how users use our website and to help us improve the structure of our website. This data does not identify you personally. Please see www.google.com/policies/privacy/partners and https://tools.google.com/dlpage/gaoptout for further information.	2 Calendar years from your interaction with the site.
------------------	------------	---	---

You may delete and block all cookies from the My InControl website by activating the setting on your browser that allows you to refuse the setting of all or some cookies. If you use your browser settings to block cookies you may find that some elements of our website may not work correctly.

The Pivi Infotainment System

The Pivi Infotainment system uses analytics tools (including first party cookies) to understand your usage of and help us to improve and identify issues with the Pivi Pro Features. You have the ability to accept or decline cookies by modifying the settings in the Pivi Infotainment system you may change your choice at any time in the vehicle settings.

Below is a list of the main cookies we use, and what we use them for.

Cookie Name	Cookie Type	Purpose	Duration
fs_uid	Persistent	This cookie is stored off-board and is used to track user identification	Expires 1 year after first use of an enabled app.
fs_session	Session	This cookie stores session information for analytics	Expires 30 days after first use of an enabled app.
fs_csrf_token	Persistent	This cookie stores a token for identification	Expires 30 days after first use of an enabled app.
fs_trusted_device	Persistent	This cookie contains device information about the Pivi system to establish a secure connection	Expires 60 days after first use of an enabled app.
fs_last_activity	Persistent	This cookie stores information about the current session to assist with session timeouts.	Expires when the Feature closes.

App Analytics

We use analytics tools to compile anonymous, aggregated statistics that allow us to understand how our customers use our Apps and to help us improve them. This includes the logging of App crashes and failures for quality assurance purposes and App usage. This data does not identify you personally. You may choose to disable App Analytics on the Apps via your account settings.